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10 **UNITED STATES DISTRICT COURT**
11
12 **CLARK COUNTY, NEVADA**

13 TRINITA FARMER, individually,

14 Plaintiff,

15 v.

16 LAS VEGAS METROPOLITAN POLICE
17 DEPARTMENT, a political subdivision of the
18 State of Nevada; KENNETH LOPERA,
19 individually; TRAVIS CRUMRINE, individually;
20 MICHAEL TRAN, individually; MICHAEL
21 FLORES, individually,

22 Defendants.

23 CASE NO: 2:18-cv-00860-GMN-VCF

24
25 **STIPULATION AND [PROPOSED]**
ORDER TO EXTEND BRIEFING
DEADLINES TO DEFENDANTS LVMPD,
CRUMRINE, FLORES AND TRAN'S
MOTIONS FOR SUMMARY JUDGMENT
(ECF NO. 125)

26 *(Second Request)*

27 WHEREAS Defendants Las Vegas Metropolitan Police Department, Travis Crumrine,
28 Michael Flores, and Michael Tran collectively filed a Motion for Summary Judgment on December
16, 2019 (ECF No. 125). The parties have previously filed a Stipulation and Order to Extend Briefing
Deadlines (First Request) on December 23, 2019 (ECF No. 142).

1 Pursuant to Local Rule IA 6-1(a), the parties hereby stipulate to extend the deadline for
2 Plaintiff to file her Response to Defendants Las Vegas Metropolitan Police Department, Travis
3 Crumrine, Michael Flores, and Michael Tran's Motion for Summary Judgment. The current deadline
4 for Plaintiff to respond to Defendants' Motions for Summary Judgment is January 13, 2020. The new
5 deadline for Plaintiff to respond to the collective Defendants Motion for Summary Judgment will be
6 January 20, 2020.

7 This extension is the second request and is not for the purpose of delay but rather because
8 defendants motion is extensive and voluminous, plaintiff requires a thorough and thoughtful response;

1 plaintiff will be filing her response to Defendant Lopera's Motion for Summary Judgment today,
2 January 13, 2020 and will require additional time to respond to the collective defendants Las Vegas
3 Metropolitan Police Department, Travis Crumrine, Michael Flores, and Michael Tran's motion for
4 summary judgment. Plaintiff's counsel does not believe both briefs can be filed simultaneously today,
5 January 13, 2020.

6 This case also involves thousands of documents and twenty-eight depositions that have to be
7 cited to the Court for decision on Defendant's Motion. Plaintiff's counsel and most of his firm have
8 been working on the oppositions for weeks.

9 This extension is made in good faith and is not intended for purposes of delay.

10 **IT IS SO STIPULATED AND AGREED.**

11 DATED this 13th day of January, 2020.

12 **LAGOMARSINO LAW**

13 /s/ Andre Lagomarsino
14 Andre M. Lagomarsino, Esq. (#6711)
15 3005 West Horizon Ridge Parkway, Suite 241
Henderson, Nevada 89052
16 *Attorney for Plaintiff Trinita Farmer*

DATED this 13th day of January, 2020.

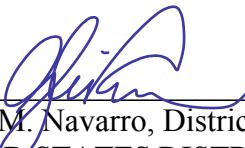
MARQUIS AURBACH COFFING

/s/ Craig R. Anderson
17 Craig R. Anderson, Esq. (#6882)
18 10001 Park Run Drive
Las Vegas, Nevada 89145
19 *Attorneys for Defendants LVMPD,
Crumrine, Tran, and Flores*

ORDER

20 **IT IS SO ORDERED.**

21 **Dated this 13 day of January, 2020.**

22 
23 _____
24 Gloria M. Navarro, District Judge
25 UNITED STATES DISTRICT COURT